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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

BARTELL RANCH LLC, et al.,)	Case No.: 3:21-cv-80-MMD-CLB
)	(LEAD CASE)
Plaintiffs,)	
)	
v.)	CONSERVATION GROUP
)	PLAINTIFFS' RESPONSE
ESTER M. MCCULLOUGH, et al.,)	TO WINNEMUCCA INDIAN
)	COLONY'S MOTION TO
Defendants,)	INTERVENE
and)	
)	
LITHIUM NEVADA CORPORATION,)	
)	
Intervenor-Defendant.)	

Plaintiffs Western Watersheds Project, Great Basin Resource Watch, Basin and Range Watch, and Wildlands Defense (collectively WWP) submit this Response to the Winnemucca Indian Colony's (WIC)'s Motion to Intervene (Doc. 179). WWP supports WIC's Motion to Intervene as a full party to this case, as detailed in WIC's filings.

WWP does not agree with the Federal Defendants’ position that briefing on the merits of this case should be delayed or bifurcated between the current parties’ claims and WIC’s claims. The Federal Defendants argue that “the Colony’s claims be briefed on a separate schedule.” BLM Response to WIC intervention, Doc. 181.

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1 be decided on coordinated and simultaneously-filed summary judgment motions for all claims by
 2 Bartell Ranch, WWP et al., and the intervening Tribal governments. “Plaintiffs and Plaintiffs
 3 Intervenor, shall file their motion for summary judgment and brief in support of their motion for
 4 summary judgment, limited to 40 pages for Plaintiff Bartell Ranch, et al., 40 pages for Plaintiff
 5 WWP, et al., and 25 pages for Plaintiff Intervenor Reno Sparks Indian Colony and 25 pages for
 6 additional Plaintiff Intervenor the Burns Paiute Tribe.” Joint Stipulation, approved Sept. 13, 2021
 7 (Doc. 94). WIC’s intervention does not change this.

8 Although this may result in some delay in briefing, WWP respectfully submits that having
 9 all parties’ arguments before this case at one time represents the best way to resolve the important
 10 issues before this Court in this case.

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 12 Respectfully submitted this 25th day of February, 2022.

13 /s/ Christopher Mixson

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19 /s/ Roger Flynn

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26 /s/ Talasi Brooks

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6 Certificate of Service

7 I, Talasi Brooks, hereby certify that I submitted the foregoing to all parties, via this Court's ECF
8 filing system, this 25th day of February, 2022.

9 /s/ *Talasi Brooks*
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